



MERIT ENERGY COMPANY

13727 Noel Road, Suite 1200 Dallas, TX 75240
Ph. 972.701.8377 Fax 972. 960.1252

February 17, 2021

Ms. Darcy O'Connor, Water Division Director
Oconnor.darcy@epa.gov
Ms. Stephanie DeJong, Wastewater Section Chief
DeJong.Stephanie@epa.gov
U.S. EPA Region 8
1595 Wynkoop Street
Denver, CO 80202

RE: Circle Ridge Field
NPDES Permit No. WY-0000949
Fremont County, Wyoming

Dear Ms. O'Connor and Ms. DeJong,

This letter is written to serve notice of Merit Energy Company, LLC's intention to permanently terminate its NPDES system and permit WY-0000949 for the Circle Ridge Field located in Fremont County, Wyoming.

Merit is hereby requesting EPA's approval to terminate the permit effective March 18, 2021. The surface discharge of produced water from the field will cease prior to March 18, 2021, in accordance with the attached plan of termination.

If you have any questions regarding the termination plan or require additional information, please contact me at (972) 628-1564.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

MERIT ENERGY COMPANY, LLC

Chad Brister
Vice President, North Division Operations

Cc: Northern Arapaho Tribal Business Council (via email)
Eastern Shoshone Tribal Business Council (via email)

Attachment

1. Merit will shut in all producing wells, isolating each well at the wellhead from common flowline system by securing the valves on locations.
2. A second isolation will be provided at the central facility tank header. This point is the inlet for all produced fluid in Circle Ridge.
3. Drain all tanks and vessels at Central Facility and block all valves to discharge system from the Central Facility.
4. Lower all fluid levels in each of the 7 discharge pits below the t-siphon outlet point to ensure no fluid is released in the future.
5. Additionally, we will shut the 3 head gates located before discharge pit 5 and 6, and downstream of pit 7.
6. Continue to monitor operations through remediation.